

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES HAYDEN,

Plaintiff,

v.

2K GAMES, INC. and TAKE-TWO
INTERACTIVE SOFTWARE, INC. ,

Defendants.

CASE NO. 1:17-cv-02635-CAB

**DECLARATION OF MIRANDA D. MEANS IN SUPPORT OF DEFENDANTS
TAKE-TWO INTERACTIVE SOFTWARE, INC. AND 2K GAMES, INC.'S
MOTION FOR SUMMARY JUDGMENT**

I, Miranda D. Means, declare as follows:

1. I am an attorney at the law firm of Kirkland & Ellis LLP. I submit this declaration in support of Defendants Take-Two Interactive Software, Inc. and 2K Games, Inc.’s (together, “Take-Two”) motion for summary judgment.

2. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the deposition transcript of Danny Green, dated June 29, 2022.

3. Attached hereto as **Exhibit B** is a true and correct copy of excerpts from the deposition transcript of LeBron James, dated June 6, 2022.

4. Attached hereto as **Exhibit C** is a true and correct copy of excerpts from the deposition transcript of Tristan Thompson, dated June 3, 2022.

5. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from the deposition transcript of James Hayden, dated October 30, 2019.

6. Attached hereto as **Exhibit E** is a true and correct copy of excerpts from the deposition transcript of Bernardino Tovanche, dated January 29, 2020.

7. Attached hereto as **Exhibit F** is a true and correct copy of a publicly available list of the salaries of Messrs. Green, James, and Thompson.

8. Take-Two did not subpoena Danny Green, LeBron James, or Tristan Thompson for the declarations that they submitted in connection with this litigation.

9. Counsel for Take-Two did not represent to Messrs. Green, James, or Thompson that their declarations were being obtained by subpoena or were in any way involuntary.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 22nd day of July, 2022.

/s/ Miranda D. Means
Miranda D. Means